



AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY
TITLE V OPERATING PERMIT

Permit No.: 139-97-TV

Plant ID: 0002

Effective Date: 24 January 2001

Expiration Date: 24 January 2006

UTM Northing: 4230.5

UTM Easting: 607.9

SIC: 7699

NAICS: 81131

AFS: 00002

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

**Allied Drum Services Inc.
401 Colorado Avenue
Louisville, Kentucky 40208-5428**

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Allied Drum Services Inc. Responsible Official: Edward Paul

Title of Responsible Official: President

Date Application Received: 2 May 1997, Revision: 24 August 2000

Date Application Administratively Complete: 19 May 1997; 31 August 2000

Date Public Notice Given: 10 September 2000

Reviewing Engineer (22)

Air Pollution Control Officer

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Abbreviations and Acronyms

AC	- Additional Condition
AFS	- AIRS Facility Subsystem

AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
°C	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
°F	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NSR	- New Source Review
NO _x	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM ₁₀	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
VOC	- Volatile Organic Compound
UTM	- Universal Transverse Mercator

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating

compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

***US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960***

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.
5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
 - ii. The permitted facility was at the time being properly operated.
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

- 6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
- 7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
- 8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)
- 9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

- 10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
- 11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)
- 12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
- 13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:
 - a. Enter the premises to inspect any emissions-related activity or records required in this permit.
 - b. Have access to and copy records required by this permit.
 - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
 - d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.
(Regulation 2.16, section 4.3.2)
- 14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year.

All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For

purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:

- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
 26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
 27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
 28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
 29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
 30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
 31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
 32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
 33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.

34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

35. **Submittal of Reports, Data, Notifications, and Applications**

- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

*Air Pollution Control District of Jefferson County
850 Barret Ave
Louisville, KY 40204-1745*

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

*US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104*

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i>)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i>)

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

Emission Unit U1 - Drum Reclamation Furnace**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3 & 5
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2.1& 4

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Allowable Emissions:

Emission Pt	Limit/Standard
E1	Opacity - < 20%, Regulation 7.08, section 3.1.1
	PM - 2.34 lb/hr, Regulation 7.08, section 3.1.2
	NO _x - < 300 ppm by volume, Regulation 7.08, Section 4
	VOC - <5.0 TPY (BACT), Regulation 7.25, section 2.1
	TAPs - BACT, Regulation 5.12, Section 2

Components:

E-1 Natural gas pyrolysis process system consisting of one drum reclamation furnace rated 10 MM BTU/hr including an afterburner rated capacity 12 MM Btu/ hour with an integrated waste-heat recovery boiler, rated 11.7 MM Btu/hour. Emissions are out of stack S1.

Additional Conditions**1. Standards** (Regulation 2.16, section 4.1.1)**a. Opacity**

The owner or operator shall not allow the opacity to equal or exceed 20%.
(Regulation 7.08, section 3.1.1)

b. PM

The owner or operator shall not allow PM emissions to exceed 2.34 pounds per hour.
(Regulation 7.08, section 3.1.2)

c. NO_x

The owner or operator shall not allow NO_x emissions to exceed 300 ppm by volume expressed as NO₂. (Regulation 7.08, Section 4)

d. **VOC**

The owner or operator shall not allow VOC emissions from this facility to meet or exceed 5 tons per year as per BACT demonstration dated 17 February 1994. (Regulation 7.25, section 3.1)

e. **TAPs**

i. The owner or operator shall comply with the equipment standards specified in additional condition 3, Regulation 5.12, Section 2, as per BACT demonstration of 17 February 1994 and 21 August 2000.

ii. The owner or operator shall process only drums meeting the hazardous waste residues criteria. This criteria is:

“The owner or operator shall not accept or store hazardous waste listed in 40 CFR Part 261.21, or 261.32, or 261.33 unless the container or inner liner has been triple-rinsed, using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate, prior to shipment to the source.”

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **Opacity**

i. To demonstrate compliance with the opacity standard, the owner or operator shall conduct a daily one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission point identified in stack S1. No more than four Emission Points shall be observed simultaneously.

ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a weekly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.

iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions or Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all

practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in 2.a.i.

b. PM

The owner or operator shall conduct emission testing for this emission unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 2.5 years after permit issuance and again within 6 months prior to permit renewal.
- ii. The emission testing shall be conducted to demonstrate ongoing compliance with the allowable mass emission rate for particulate matter.
- iii. The following test methods shall be employed for any PM compliance testing: 40 CFR Part 60 appendix A, Methods 1-5, and 9.
- iv. The test shall be conducted while the emission unit is operating at or near its maximum capacity, but no less than 90% of the maximum capacity, unless otherwise specified or approved by the District.

c. NO_x

- i. The owner or operator shall continuously monitor the temperature in the combustion zone and the afterburner combustion chamber as a surrogate for demonstrating compliance with the 300 ppm NO_x standard. The temperature shall be 1600 °F plus or minus 100 °F.
- ii. The owner or operator shall assess each residual product that may be contained in the drums, for high nitrogen content. No residual product shall contain bound nitrogen in an excess amount to cause an exceedance of 300 ppm. The owner or operator shall determine the percentile, bound nitrogen content limit based on its most recent source test results.

d. VOC

The owner or operator shall not process more than 300 drums per hour for each operating day. (Regulation 7.25, Section 4.1, 4.2 and BACT Analysis)

- i. The owner or operator shall conduct emission testing for this emission unit in accordance with the following requirements:
 - 1) The emission testing shall be conducted within 2.5 years after permit issuance and within 6 months prior to permit renewal.
 - 2) The emission testing shall be conducted to demonstrate ongoing compliance with the allowable mass emission rate for destruction efficiency (DE)

- 3) The following test methods shall be employed for any DE compliance testing: 40 CFR Part 60 appendix A, Methods 1-5, and 25A.
- 4) The test shall be conducted while the emission unit is operating at or near its maximum capacity, but no less than 90% of the maximum capacity, unless otherwise specified or approved by the District.

e. TAPs

- i. The owner or operator shall not allow more than 2.54 centimeters (one inch (1")) of residue to remain on the bottom of the container or inner liner upon receipt.
- ii. The owner or operator shall not allow more than three percent (3%) of the material by weight of the total capacity of the container remains in the container or inner liner (if the container is less than or equal to one hundred ten (110) gallons in size) upon request.
- iii. The owner or operator shall not allow, accept or store hazardous waste listed in 40 CFR Part 261.21 or 261.32, or 261.33 unless the container or inner liner has been triple-rinsed, using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate, prior to shipment to the source.
- iv. The owner or operator shall maintain a "rail arm" to be lowered to prevent drums entering the furnace once the afterburner temperature drops below 1600 °F and immediately after the warning light and siren are automatically activated. The owner or operator shall record each incident or malfunction in the "burner log" that shall be maintained on site.
- v. The owner or operator shall not accept or process PolyChlorinatedBiphenols or Radioactive Material at this plant.
- vi. The owner or operator shall maintain an operational temperature of at least 1600° F in the thermal incinerator (afterburner).
- vii. The owner or operator shall, per BACT analysis dated March 2, 1995, operate three conveyor lines that will pass the drums to either: (A) feed through drum furnace or (B) feed to a designated storage area for reject drums, (these drums shall have lids on them), i.e., not entered in data base, unlabeled, or heavy, and (C) distribute drum back to a staging area for charging during the next hour.
- viii. The owner or operator shall operate and maintain a continuous automatic temperature recording device to which measures and records the temperature of the afterburner to demonstrate ongoing compliance with additional conditions 3.c.i, 3.d and 3.e.vi. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature

monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations.

4. Record Keeping (Regulation 2.16, section 4.1.9.2)

a. Opacity

Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

b. PM

The owner or operator shall maintain records of daily production rates and daily hours of operations to demonstrate compliance with hourly PM emission standard of 13.41 lb/hr utilizing AP-42 emission factors.

c. NO_x

- i. The owner or operator shall maintain records of the monitored temperature.
- ii. The owner or operator shall maintain records demonstrating compliance with additional condition 2.c.ii.
- iii. The owner or operator shall maintain records of the comparisons of the parametric values and the base line as established during the most recent source test.
- iv. The owner or operator shall maintain records of NO_x emissions, as calculated, in parts per million, by volume.

d. VOC

See additional condition 4.e.

e. TAPs

The owner or operator shall maintain an Emission Tracking computer program to monitor ongoing compliance with District regulations 5.12 and 7.25. The program shall record the following information for each drum processed.

- i. Product in drum;
- ii. Drum Size;
- iii. Percent of each TAP and VOC constituents in each product;
- iv. Amount of residual product in drum (heel);

- v. Whether drum was processed or rejected;
- vi. Amount of TAP and VOC combusted per hour;
- vii. Emission limits for TAPs and VOC's; and
- viii. Number of barrels processed per hour.

The computerized tracking system shall maintain a running record of all drums processed and rejected and this record shall be made available to the District upon request.

4. Reporting (Regulation 2.16, section 4.1.9.3)

a. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time, and result of each Method 9 or Method 22 conducted (or a negative declaration, if none)
- iv. Description of any corrective action taken pursuant to Additional Condition 2.a.iii.

b. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit/Point ID Number
- ii. The beginning and ending date of the reporting period
- iii. Identification of all periods of exceedances of the hourly PM limit including the quantity of excess emissions
- iv. Reason for excess emissions
- v. Description of corrective action taken to prevent future exceedance.

c. NO_x

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for NO_x:

- i. Emission Unit/Point ID Number
- ii. The beginning and ending date of the reporting period
- iii. Identification of all periods of exceedances of the NO_x 300 ppm limit including the quantity of excess emissions.
- iv. Reason for excess emissions
- v. Description of corrective action taken to prevent future exceedances
- vi. A negative declaration, if no exceedance occurred during the reporting period.

d. **VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC:

- i. Emission Unit ID number.
- ii. The beginning and ending date of the reporting period.
- iii. The monthly computer record tracking total VOC emissions
- iv. Identification of all periods, including the duration of time, the after burner temperature drops below 1600⁰ F for each day the emission unit was in operation.

e. **TAPs**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for TAPs:

- i. Emission Unit ID number.
- ii. The beginning and ending date of the reporting period.
- iii. Record of the dates and times program shut down drum feed due to hourly limits of TAPs.
- iv. Identification of all periods, including the duration of time, the after burner temperature drops below 1600⁰ F for each day the emission unit was in operation.

Emission Unit U2 - 55, 30 gallon coating process - paint booths for surface coating of 55 and 30 gallon steel drums

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standard of Performance for Existing Process Operations	1, 2, 3.1, 3.2 & 5
7.08	Standards of Performance for New Process Operations	1, 2, 3.1.1, 3.1.2 & 5
6.31	Standard of Performance for Existing Miscellaneous Metal Parts and Products Surface Coating Operations	1, 2, 3, 4, 5, 6 & 7
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1, 2, 3, 4, 5, 6 & 7

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1 through 5
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Allowable Emissions:

Emission Pt	Limit/Standard
E2, E7 & E8	Opacity - <20% (Regulation 6.09, section 3.1)
	PM - 2.58 lbs/hr (Regulation 6.09, section 3.2)
	VOC - See Additional Condition 1.c. (Regulation 6.31, Section 3)
	TAPs - < ASL (Regulation 5.11)
E3, E4, E5, E6, E9 & E10	Opacity - <20% (Regulation 7.08, section 3.1.1)
	PM - 2.34 lbs/hr for each booth (Regulation 7.08, section 3.1.2)
	VOC - See Additional Condition 1.c. (Regulation 7.59, Section 3)
	TAPs - < ASL (Regulation 5.12)

Components:

Emission Point	Description	Date of Installation	Stack ID
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E2	55 and 30 Gallon Tight-Head Drum Paint Booth	June 1973	S2
E3	Drum and Lid and Final Drying Oven	February 1994	S3
E4	Drum and Lid and Final Drying Oven	February 1994	S4
E5	Open-Head Drum Lining Booth #1	July 1992	S5
E6	Open-Head Drum Lining Booth #2; Lid Lining Booth	July 1992	S6
E7	Lining Oven	May 1973	S7
E8	Lining Oven	May 1973	S8
E9	Open-Head Paint Booth	November 1979	S9
E10	Lid Paint Booth	November 1986	S10

Control Devices:

None

Additional Conditions**1. Standards** (Regulation 2.16, section 4.1.1)**a. Opacity**

- i. The owner or operator shall, for each particulate matter (PM) Emission Point subject to 6.09 (section 3.1), not cause or permit the discharge of emissions in excess of 20% opacity.
- ii. The owner or operator shall, for each particulate matter (PM) Emission Point subject to 7.08 (section 3.1.1), not cause or permit the discharge of emissions in excess of 20% opacity.

b. PM

- i. The owner or operator shall, for the one booth subject to 6.09 (section 3.2), not cause or permit the discharge of emissions in excess of 2.58 lb/hr.
- ii. The owner or operator shall, for each booth subject to 7.08 (section 3.1), not cause or permit the discharge of emissions in excess of 2.34 lb/hr.

c. VOC (Regulation 6.31, section 3 and 7.59, section 3)

The owner or operator shall not allow or cause the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of the following:

- i. 4.3 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for clear coatings
- ii. 3.5 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for air-dried coatings
- iii. 3.5 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings
- iv. 3.0 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for all other coatings

d. **TAPs**

The owner or operator has modeled the Toxic Air Pollutant (TAP) emissions from these affected facilities. The model showed that the source may utilize, at a minimum, three times as much coating and remain in compliance with the TAP emission limits. (Model dated 21 August 2000)

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **Opacity**

- i. The owner or operator shall, to demonstrate compliance with the opacity standard, conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stacks S2 through S10) in U2.
- ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours.
- iii. At Emission Points where visible emissions are observed, the owner or operator shall Initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.a.i.

b. **PM**

- i. The owner or operator shall operate the Dry Filter System whenever the emission unit is in operation.
 - ii. The owner or operator shall calculate, monthly, the amount of particulate emitted, on an hourly basis, to the ambient air, based on: amount and solids content of each coating used; over spray per AP 40; hours of operation; and the collection efficiency of the filtration devices used to control emissions.
 - iii. See Record keeping requirement 3.b.
- c. **VOC**
 - i. The owner or operator shall calculate the amount of VOC emitted to the ambient air, based on the quantity and VOC content (excluding water and exempt solvents) of each coating, thinner, reducer or any other VOC containing material used during each calendar month.
 - ii. The owner or operator shall then determine daily average compliance with the VOC standard.
- d. **TAPs**

No compliance monitoring is required for all coatings used in the Model run of 21 August 2000. The owner or operator shall compare all new coatings to those modeled and as long as the coatings are chemically similar, no other compliance monitoring is required. All new coatings, that have dis-similar constituents from those modeled, must be evaluated for compliance with the TAP limits.

3. Record Keeping (Regulation 2.16, section 4.1.9.2)

a. Opacity

Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

b. PM

The owner or operator shall maintain the following daily records to monitor ongoing compliance with the PM emission limits:

- i. The quantity, type and percent solids of each coating used.

- ii. The total hourly PM emissions based on the solids content of each coating; the over spray per AP 40; the hours of actual operation of the coating operation during each operating day and the collection efficiency of the Dry Filter System used to control PM emissions.
- iii. The time periods when the Dry Filter System was not in service when the emission unit was in operation.
- iv. Compliance with the particulate matter emission standard shall be determined by the following:

Pounds per hour = Weight of gallon of coating X percent by weight of solids
X number of gallons of coating applied per hour X transfer efficiency X (1 - Control efficiency).

c. **VOC**

The owner or operator shall keep monthly records, of all coating used, types of materials coated, and calculations that demonstrate compliance with the applicable VOC standard, as applied.

d. **TAPs**

The compliance records, required for VOC, shall suffice for TAP compliance.

4. Reporting (Regulation 2.16, section 4.1.9.3)

a. **Opacity**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time, and results of each Method 9 conducted
(or a negative declaration If none)
- iv. Description of any corrective action taken pursuant to Additional Condition 1.a.iii.

b. **PM**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit ID Number
- ii. The beginning and ending date of the reporting period
- iii. The monthly and year to date total particulate emissions
- iv. Identification of all periods of exceedances of the standards including the quantity of excess emissions
- v. Description of any corrective action taken pursuant to 4.b.iv.
- vi. Identification of all periods when the Dry Filter System was not in service when the emission unit was in operation.

c. **VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC

- i. Emission Unit ID Number
- ii. The beginning and ending date of the reporting period
- iii. Identification of all periods of exceedances of the coating VOC limit including the quantity of excess emissions
- iv. Description of any corrective action taken pursuant to 4.c.iii.

d. **TAPs**

There are no compliance reports required. However, the owner or operator shall report to the District, any new coating, with a new TAP, that is found to exceed the calculated ASL.

Emission Unit U3 - 16 gallon coating process - paint booth for surface coating 16 gallon steel drums.

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3.1.1, 3.1.2 & 5
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	Sec. 1, 2, 3, 4, 5, 6

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Allowable Emissions:

Emission Pt	Limit/Standards
E11 & E12	Opacity - <20% (Regulation 7.08, section 3.1.1)
	PM - 2.34 lbs/hr (Regulation 7.08, section 3.1.2)
	VOC - See Additional Condition 1.c. (Regulation 7.59, Section 3)
	TAPs - < ASL (Regulation 5.12)

Components:

Emission Point	Description	Date of Installation	Stack ID
E11	16 Gallon Tight-Head Paint Booth	June 1993	S11
E12	Drying Oven	February 1993	S12

Control Devices:

None

Additional Conditions**1. Standards** (Regulation 2.16, section 4.1.1)**a. Opacity**

The owner or operator shall, for each particulate matter (PM) Emission Point subject to 7.08 (section 3.1.1), not cause or permit the discharge of emissions in excess of 20% opacity.

b. PM

The owner or operator shall, for each particulate matter (PM) Emission Point subject to 7.08 (section 3.1), not cause or permit the discharge of emissions in excess of 2.34 lb/hr.

c. VOC

The owner or operator shall not allow or cause the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of the following:

- i. 4.3 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for clear coatings
- ii. 3.5 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for air-dried coatings
- iii. 3.5 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings
- iv. 3.0 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for all other coatings

d. TAPs

The owner or operator has modeled the Toxic Air Pollutant (TAP) emissions from these affected facilities. The model showed that the source may utilize, at a minimum, three times as much coating and remain in compliance with the TAP emission limits. (Model dated 21 August 2000)

2. Monitoring (Regulation 2.16, section 4.1.9.1.2)

a. Opacity

- i. The owner or operator shall, to demonstrate compliance with the opacity standard, conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stacks S11 and S12) in U-3.
- ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours.
- iii. At Emission Points where visible emissions are observed, the owner or operator shall Initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.a.i.

b. PM

- i. The owner or operator shall operate the Dry Filter System whenever the emission unit is in operation.
- ii. The owner or operator shall calculate, monthly, the amount of particulate emitted, on an hourly basis, to the ambient air, based on: amount and solids content of each coating used; over spray per AP 40; hours of operation; and the collection efficiency of the filtration devices used to control emissions.
- iii. See Record keeping requirement 3.b.

c. VOC

- i. The owner or operator shall calculate the amount of VOC emitted to the ambient air, based on the quantity and VOC content (excluding water and exempt solvents) of each coating, thinner, reducer or any other VOC containing material used during each calendar month.
 - ii. The owner or operator shall then determine daily average compliance with the VOC standard.
- d. **TAPs**

No compliance monitoring is required for all coatings used in the Model run of 21 August 2000. The owner or operator shall compare all new coatings to those modeled and as long as the coatings are chemically similar, no other compliance monitoring is required. All new coatings, that have dis-similar constituents from those modeled, must be evaluated for compliance with the TAP limits.

3. Record Keeping (Regulation 2.16, section 4.1.9.2)

a. **Opacity**

Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

b. **PM**

The owner or operator shall maintain the following daily records to monitor ongoing compliance with the PM emission limits:

- i. The quantity, type and percent solids of each coating used.
- ii. The total hourly PM emissions based on the solids content of each coating; the over spray per AP 40; the hours of actual operation of the coating operation during each operating day and the collection efficiency of the Dry Filter System used to control PM emissions.
- iii. The time periods when the Dry Filter System was not in service when the emission unit was in operation.
- iv. Compliance with the particulate matter emission standard shall be determined by the following:

$$\text{Lbs/hr} = \text{Wgt of gallon of coating} \times \% \text{ by wgt of solids} \times \text{gallons of coating applied per hour} \times \text{TE (transfer efficiency)} \times \text{CE (Control efficiency)}$$

c. **VOC**

The owner or operator shall keep monthly records, of all coating used, types of materials coated, and calculations that demonstrate compliance with the applicable VOC standard, as applied.

d. **TAPs**

The compliance records, required for VOC, shall suffice for TAP compliance.

4. Reporting (Regulation 2.16, section 4.1.9.3)

a. **Opacity**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time, and results of each Method 9 conducted (or a negative declaration If none)
- iv. Description of any corrective action taken pursuant to Additional Condition 1.a.iii.

b. **PM**

The owner or operator shall include, at a minimum, the following information in the semi- annual compliance monitoring reports for PM:

- i. Emission Unit ID Number
- ii. The beginning and ending date of the reporting period
- iii. The monthly and year to date total particulate emissions
- iv. Identification of all periods of exceedances of the standards including the quantity of excess emissions
- v. Description of any corrective action taken pursuant to 4.b.iv.
- vi. Identification of all periods when the Dry Filter System was not in service when the emission unit was in operation.

c. **VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC

1. Emission Unit ID Number
2. The beginning and ending date of the reporting period
3. Identification of all periods of exceedances of the coating VOC limit including the quantity of excess emissions
4. Description of any corrective action taken pursuant to 4.c.3.

d. **TAPs**

There are no compliance reports required. However, the owner or operator shall report to the District, any new coating, with a new TAP, that is found to exceed the calculated ASL.

Emission Unit U4 - Boiler**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.07	Standards of Performance for Existing Indirect Heat Exchangers	Sections 1, 2, 3.1, 3.2, 4.1

Allowable Emissions:

Emission Pt.	Limits / Standards
E13	PM - 0.45 lb/MMBtu (Regulation 6.07, section 3.1)
	Opacity - 20 % (Regulation 6.07, section 3.2)
	SO ₂ - 1 lb/MMBtu (Regulation 6.07, section 4.1)

Components:

One (1) 25.2 MMBtu/hr boiler, natural gas fired only and emits out stack S13.

Additional Conditions**1. Standards** (Regulation 2.16, section 4.1.1)**a. Opacity** (Regulation 6.07, section 3.2)

- i. No owner or operator subject to this regulation shall cause the emission into the open air of particulate matter from any indirect heat exchanger which is greater than 20% opacity.
- ii. 1.a.i shall not apply to:
 - 1) Emissions into the open air of particulate matter from any indirect heat exchanger during building a new fire, cleaning the fire box, or blowing soot for a period or periods aggregating not more than ten minutes in any 60 minutes which are less than 40% opacity;
 - 2) Emissions from waterwall spreader-stoker indirect heat exchangers during startup operations if the emissions do not exceed the following limits:
 - A) First 30 minutes - 80% opacity;
 - B) Next hour - 60% opacity; and
 - C) Next 2½ hours - 40% opacity.
 - 3) Emissions up to 40% opacity from all other waterwall indirect heat exchangers for any 30-minute period during startup operations.

b. PM (Regulation 6.07, section 3.1)

The owner or operator shall not cause to be discharged into the atmosphere, any gases which contain particulate matter in excess of 0.45 lb/MMBtu

c. SO₂ (Regulation 6.07, section 4.1)

The owner or operator shall not cause to be discharged into the atmosphere, any gases which contain sulfur dioxide in excess of 1 lb/MMBtu.

2. Monitoring (Regulation 2.16, section 4.1.9.1.2)**a. Opacity**

- i. The owner or operator shall comply with the following opacity monitoring requirements for this boiler when combusting natural gas:
 - 1) The owner or operator shall conduct a one (1) minute visible emissions survey for stack S13 once per operating week; and

- 2) If during twelve consecutive operating weeks, there are no visible emissions observed from stacks S13, the owner or operator may elect to conduct monthly visible emission surveys; or
 - 3) If visible emissions are observed from stack S13, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If visible emissions persist, the owner or operator shall, within 24 hours, perform a Method 9 test. If the opacity is exceeding the standard, the owner or operator shall notify the District and take all practical steps to eliminate the exceedance.
 - ii. If visible emissions were observed, the owner or operator shall initiate the monitoring schedule specified in 2.a.i.1).
 - b. **PM**

See comment
 - c. **SO₂**

See comment
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. **Opacity**

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2.a.i.3) or 2.a.iii.2) shall be documented and records made available to the District upon request.
 - b. **PM**

No compliance monitoring records required.
 - c. **SO₂**

No compliance monitoring records required.
4. **Reporting** (Regulation 2.16, section 4.1.9.3)
 - a. **Opacity**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit/Point ID number and Stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time and results of each Method 9 conducted
- iv. Description of any corrective action taken pursuant to Additional Condition 2.a.i.3) or 2.a.iii.2).

b. PM

No compliance monitoring reports required.

c. SO₂

No compliance monitoring reports required.

Comment

Calculations of potential uncontrolled SO₂ and PM emission using the applicable AP-42 emission factors demonstrate that the SO₂ and PM emission standards specified in Regulation 6.07 cannot be exceeded when combusting natural gas.

Emission Unit U5 - Five Shot Blast Booths: Sheet steel blasted by shot to remove rust, coating residue and mill scale.

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3 & 5

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Allowable Emissions:

Emission Unit	Emission/ Equipment Standard
U-5	PM - 2.34 lb/hr each (Regulation 7.08, section 3.1.2)
	Opacity - < 20 % (Regulation 7.08, section 3.1.1)
	TAPs - < ASL (Regulation 5.12)

Components:

Two (2) open head steel shot blast booths each with an associated baghouse
 One (1) tight head steel shot blast booth with baghouse
 One (1) lid blaster steel shot blast booth with baghouse
 One (1) ring blaster steel shot blast booth with baghouse

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. **PM**

For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 of Regulation 7.08. (section 3.3), i.e.: 2.34 lb/hr for each shot blaster and associated baghouse.

b. **Opacity**

No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (Regulation 7.08, section 3.1)

c. **TAPs**

The owner or operator performed a BACT analysis for this emission unit. The associated baghouses are determined to be BACT.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **PM**

No compliance monitoring for PM is required, see comment.

b. **Opacity**

- i. The owner or operator shall conduct a daily one (1) minute visible emission survey for each stack associated with U5 for each operating day.
- ii. At any stack where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance.

c. **TAPs**

The owner or operator shall inspect each baghouse for the following items:

- i. Verify fan is running and belts are on daily.
- ii. Verify dampers are working properly daily.

- iii. Verify cleaning mechanism is working properly every two weeks
- iv. Replace all worn bags as needed.
- v. Verify bags are clean and not filled with dust weekly
- vi. Verify dust removal system is working properly weekly, and
- vii. Inspect each exhaust stack for signs of dust every two weeks.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. **PM**

No record keeping is required, see comment.

b. **Opacity**

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from AC # 2.b.ii. above shall be documented and records made available to the District upon request.

c. **TAPs**

The owner or operator shall maintain the following records to monitor ongoing compliance with Regulation 5.12:

- i. The owner or operator shall maintain records of daily production rates and daily hours of operations to demonstrate compliance with hourly TAP emission standards utilizing the AP-42 emission factors.
- ii. The owner or operator shall maintain records of all inspections and maintenance performed for each baghouse.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. **PM**

No reporting is required for PM, see comment.

b. **Opacity**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit/Point ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each Method 9 conducted. If no Method 9 tests were conducted during the reporting period, the owner or operator may submit a negative declaration;
- iv. Description of any corrective action taken pursuant to AC # 2.b.ii.

c. TAPs

The reporting requirements of 4.b will also satisfy the reporting requirements for TAPs.

Comment

The owner or operator has demonstrated, via calculations and the utilization of emission factors from AP-42, section 12.10-7, that uncontrolled, these processes do not exceed the allowable PM emission limits.

Emission Unit U6 - Acid Scrubber/Flusher: Drums are flushed with acid remove rust, acid fumes are captured and removed by packed bed scrubber.

Applicable Regulations:

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Allowable Emissions:

Emission Unit	Emission/ Equipment Standard
U6	TAPs - < ASL (Regulation 5.12)

Components:

- one - Acid flushing unit
- one - packed bed scrubber emitting out stack S15

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

TAPs

The owner or operator performed a BACT analysis, which was submitted 23 August 2000 and has been approved by the District. The BACT determination is that the scrubber offers the best control of the acid.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

TAPs

- a. The owner or operator shall maintain water recirculation through the scrubber, when in operation. (Regulation 5.12)
 - b. The owner or operator shall perform the weekly and monthly Preventative Maintenance (PM) on the unit. (Regulation 5.12)
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. The owner or operator shall maintain records of PM, including who performed the PM, when it was performed, and what was done. (Regulation 5.12)
 - b. The owner or operator shall maintain records of amount of HCL added to system and its concentration. (Regulation 5.12)
 - c. The owner or operator shall maintain records of amounts of water added to system. (Regulation 5.12)
4. **Reporting** (Regulation 2.16, section 4.1.9.3)

No compliance reporting is required.

PERMIT SHIELD

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all the conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance per District Regulation 2.16, section 4.6.1.1.

OFF-PERMIT DOCUMENTS

There are no off-permit documents associated with this Title V permit.

ALTERNATIVE OPERATING SCENARIO

The company requested no alternative operating scenario in its Title V application.

SOURCE-WIDE HAP SPECIATION	
Pollutant	CAS #
Ethyl benzene	100-41-4
Formaldehyde	50-00-0
Glycol ethers	N/A
Methyl ethyl ketone	78-93-3
Methyl isobutyl ketone	108-10-1
Methyl methacrylate	80-62-6
Phenol	108-95-2
Styrene	100-42-5
Toluene	108-88-3
Triethylamine	121-44-8
Xylene	1330-20-7

Insignificant Activities		
Description	Quantity	Basis
Internal Combustion Engines	8 tractors, 2 forklifts	Reg. 2.02, sec.2.1.1
Heat Treating	3 ovens	Reg. 2.02, sec.2.3.14
Brazing, Soldering,/ Welding	Various	Reg. 2.02, sec.2.3.4
Soil/Groundwater remediation (future)	Future Remediation Schedule (2)	Reg. 2.02; Sec.2.3.20
Closed Head Drum Caustic Washing Operation	170 Closed head drums/hr	Negligible emissions

Acid Scrubber/Flusher	3300 gal/yr (1)	Negligible emissions
Fly Ash Hopper in a water bath	1	No regulated emissions
Emergency Generator (IC engine)	1	Reg 2.02, sec 2.2
Above Ground Diesel Fuel Storage Tank (550 gallons)	1	Reg. 2.02, sec 2.3.9.2

- A. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- B. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
- i. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
 - ii. No periodic monitoring shall be required for facilities designated as insignificant activities.